UNITED STATES DISTRICT CO	URT
SOUTHERN DISTRICT OF NEW	YORK

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SPANSKI ENTERPRISES, INC. and POLTEL INTERNATIONAL L.L.C.,

Plaintiffs, :

-against-

07 Civ 930 (GEL) (GWG)

TELEWIZJA POLSKA S.A., ANNA MILEWSKA, KRZYSZTOF SZTANDERA,

MILEWSKA, KRZYSZTOF SZTANDERA, DECLARATION OF JOHN A. PISKORA IN MARCIN BOCHENEK, JOHN DOES 1-10, SUPPORT OF PLAINTIFFS' MOTION TO

COMPEL

Defendants.

TELEWIZJA POLSKA U.S.A. INC., TELEWIZJA POLSKA CANADA INC. and BOGUSLAW M. SPANSKI,

Third Party Defendants. :

## I, JOHN A PISKORA, hereby declare as follows:

- 1. I am an attorney admitted to practice before the bar of this Court, and am associated with the law firm Loeb & Loeb LLP, attorneys for Plaintiffs Spanski Enterprises, Inc. and Poltel International L.L.C. in this action.
- 2. I make this declaration in support of Plaintiffs' motion to compel the production, in unredacted form, of documents from Defendant Telewizja Polska, S.A.'s ("TVP") relevant to the claims and defenses raised in this action.
- 3. Attached hereto as Exhibit A are true and correct copies of redacted documents TVP produced to Plaintiffs in response to discovery, and indicative of the document production as a whole.

- 4. Attached hereto as Exhibit B are true and correct copies of a number of TVP websites wherein TVP publicly discloses the names, positions and contact information for certain of its employees.
- 5. Attached hereto as Exhibit C is a true and correct copy of relevant transcript portions of the May 16, 2007 hearing in this action before Judge Lynch.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 19<sup>th</sup> day of July, 2007.

John A. Piskora